

Exhibit A
July Fee Application

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:

W.R. GRACE & CO., *et al*

Debtors.

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Chapter 11

Case No. 01-01139 (JJF)
(Jointly Administered)

**SUMMARY COVERSHEET TO FOURTH MONTHLY INTERIM APPLICATION OF
WALLACE KING MARRARO & BRANSON PLLC
FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES FOR
JULY 1, 2001 THROUGH JULY 31, 2001**

Name of Applicant:	Wallace King Marraro & Branson PLLC. ("WKMB")
Authorized to provide professional services to:	Special Litigation and Environmental Counsel to Debtors
Date of Retention:	April 2, 2001
Period for which compensation and reimbursement is sought:	July 1, 2001 through July 31, 2001.
Amount of compensation sought as actual, reasonable and necessary	\$101,544.08 for the period July 1, 2001 through July 31, 2001 (80% of \$126,930.10 in professional fees).
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$52,387.36 for the period July 1, 2001 through July 31, 2001.

This is a: Monthly interim application.

The total time expended for fee application preparation in July 2001 is approximately 8.8 hours and the corresponding compensation requested is approximately \$3,696.00. Such amounts are included on the invoice for services performed during July 2001, Matter 10.

Prior Applications filed: Yes.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Status of Fees	Status of Expenses
7/5/01	4/2/01 through 4/30/01	\$216,471.50	\$25,282.16	No objections served on Counsel	No objections served on Counsel
7/5/01	5/1/01 through 5/31/01	\$244,726.00	\$26,594.89	No objections served on Counsel	No objections served on Counsel
8/9/01	6/1/01 through 6/20/01	\$186,977.91	\$90,104.66	No objections served on Counsel	No objections served on Counsel

As indicated above, this is the fourth application for interim compensation of services filed with the Bankruptcy Court in the Chapter 11 Cases

Summary of Compensation Requested

Name of Professional Individual	Position, year assumed, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Christopher Marrarp	Partner	\$420	184.3	\$77,406.00
Angela Pelletier	Associate	\$200	163.6	\$32,720.00
William Hughes	Counsel	\$305	215.6	\$65,758.00
Tamara Parker	Associate	\$260	77.4	\$10,124.00
Anthony F. King	Partner	\$375	1.5	\$562.50
Alec Zacaroli	Associate	\$185	62.1	\$11,488.50
Peter Condon	Counsel	\$335	61.5	\$20,602.00
Barbara Banks	Paralegal	\$130	201.0	\$26,130.00
Darlene Boozer	Legal Clerk	\$95	131.3	\$12,473.00
Natasha Bynum	Legal Clerk	\$95	120.9	\$11,485.50
Mahmoude Moasser	Paralegal	\$130	46.5	\$6,045.00

Rebecca Mitchell	Paralegal	\$115	.4	\$46.00
Tonya Manago	Senior Paralegal	\$130	7.7	\$1001.00
Paul Pittman	Paralegal	\$115	2.3	\$264.50
Reilly Smith	Paralegal	\$115	30.3	\$3,484.50

Total Fees \$289,591.50

Total Hours 1306.4

EXPENSE SUMMARY

Expense Category	Total Expenses
Airfares	\$2,697.25
Outside Messenger	\$156.12
Auto Rental	\$716.10
Copies- Internal and Outside	\$24,511.91
Hotels	\$2,134.40
Facsimile	\$149.25
Lexis	\$5,445.24
Meals during Travel	\$986.86
Telephone	\$352.75
FedEx	\$2,007.41
Parking	\$200.50
Taxis/Miscellaneous Travel Expenses	\$269.10
Westlaw	\$8,826.00
Overtime Meals	\$633.36
Overtime Meals - Attorneys/Paralegals	\$200.91
Overtime Transportation	\$306.60
Secretarial Overtime	\$2,793.60
Total	\$52,387.36

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (JJF)
) (Jointly Administered)
)
Debtors.)

VERIFICATION

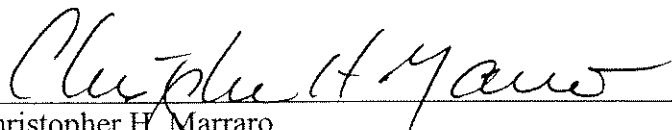
Christopher H. Marraro, after being duly sworn according to law, deposes and says:

1. I am a partner with the applicant firm, Wallace King Marraro & Branson, PLLC and I am a member in good standing of the bars of the State of New Jersey and District of Columbia.

2. I have personally performed certain of, and overseen the legal services rendered by Wallace King Marraro & Branson PLLC as special litigation and environmental counsel to the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the firm.

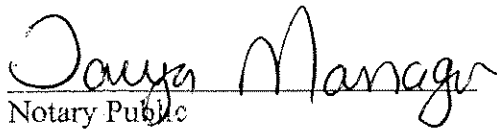
¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.


Christopher H. Marraro

In the District of Columbia

SWORN TO AND SUBSCRIBED
before me this 28th day of August 2001.


Notary Public

My Commission Expires:

Tonya Manago
Notary Public, District of Columbia
My Commission Expires 03-14-05

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (JJF)
) (Jointly Administered)
)
Debtors.)

**VERIFIED APPLICATION OF WALLACE KING MARRARO & BRANSON FOR
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES
AS SPECIAL COUNSEL TO W. R. GRACE & CO., ET AL., FOR
THE FOURTH INTERIM PERIOD FROM JULY 1, 2001 THROUGH JULY 31, 2001**

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Fed. R. Bankr. P. 2016, the Retention Order (as defined below), the Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the “Interim Compensation Order”) and Del.Bankr.LR 2016-2, the law firm of Wallace King Marraro & Branson PLLC (“WKMB”) as special litigation and environmental counsel for the above-captioned debtors and debtors in possession (collectively, “Debtors”) in connection with their chapter 11 cases, hereby

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food ‘N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

applies for an order allowing it (i) compensation in the amount of \$126,930.10 for the reasonable and necessary legal services WKMB has rendered to the Debtors and (ii) reimbursement for the actual and necessary expenses that WKMB incurred in the amount of \$52,387.36 (the "Application"), in each case for the period from July 1, through July 31, 2001 (the "Fee Period"). In support of this Application, WKMB respectfully states as follows:

Retention of WKMB

1. On April 2, 2001 (the "Petition Date"), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On April 12, 2001, the office of the United States Trustee appointed (i) a committee of unsecured creditors in the Chapter 11 Cases (the "Creditors' Committee"), (ii) a committee of asbestos personal injury claimants (the "Asbestos Personal Injury Committee") and (iii) a committee of asbestos property damage claimants (the "Asbestos Property Damage Committee."). On June 18, 2001, the office of the United States Trustee appointed a committee of equity security holders (the "Equity Security Holders' Committee," collectively with the Creditors' Committee, the Asbestos Personal Injury Committee and the Asbestos Property Damage Committee, the "Committees").

2. By this Court's order dated June 21, 2001, the Debtors were authorized to retain WKMB as their special counsel, effective as of the Petition Date, with regard to environmental and litigation matters (the "Retention Order"). The Retention Order authorizes the Debtors to compensate WKMB at hourly rates charged by WKMB for services of this type and to be

reimbursed for actual and necessary out-of-pocket expenses that it incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

3. The Retention Order also allowed for a special fee arrangement with the Debtors in connection with a pending litigation matter, *Interfaith Community Organization v. Honeywell International, Inc. et al* (*'Honeywell litigation'*). By Agreement with the Debtors, WKMB is entitled to receive its full standard hourly rates until June 21, 2001 when its standard hourly rates billed for the Honeywell litigation will be reduced by 40% in return for an interest in the outcome of the Honeywell litigation. Thus, a 40% discount is applied to all professional fees billed after June 21, 2001.

4. As disclosed in the following affidavit:

Affidavit of Christopher H. Marraro in Support of Application for Order Under 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) Authorizing the Employment and Retention of Wallace King Marraro & Branson as Special Litigation and Environmental Counsel for the Debtors and Debtors in Possession (the "Original Affidavit"), filed June 4, 2001;

WKMB does not represent any interest adverse to the estates.

5. WKMB does not currently represent, but could in the future represent parties-in-interest in connection with matters unrelated to the Debtors and the Chapter 11 Cases. WKMB will update the Affidavits when WKMB becomes aware of material new information.

6. WKMB performed the services for which it is seeking compensation on behalf of the Debtors and their estates, and not on behalf of any committee, creditor or other person.

7. On or about July 9, 2001, Grace paid Wallace King Marraro & Branson, PLLC an ordinary course professional allowance of \$50,000.00 for the month of July. That amount is reflected as a credit on the invoice statement for the Honeywell matter.

8. Pursuant to Fed. R. Bank. P. 2016(b), WKMB has not shared, nor has agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of WKMB, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

9. This is the fourth application for interim compensation for services rendered that WKMB has filed with the Bankruptcy Court in connection with the Chapter 11 Cases.

Reasonable and Necessary Services Rendered by WKMB-- Generally

10. The WKMB attorneys who rendered professional services during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years as an attorney	Department	Hourly billing rate	Total billed hours	Total compensation
Christopher Marraro	Partner	18 Years	Litigation	\$420.00	184.30	\$77,406.00
Anthony F. King	Partner	11 Years	Litigation	\$375.00	1.50	\$562.50
William Hughes	Counsel	10 Years	Litigation	\$305.00	215.60	\$65,758.00
Tamara Parker	Associate	8 Years	Litigation	\$260.00	77.40	\$20,124.00
Angela Pelletier	Associate	3 Years	Litigation	\$200.00	163.60	\$32,720.00
Peter Condron	Counsel	13 Years	Litigation	\$335.00	61.50	\$20,602.50
Alec Zacaroli	Associate	2 Years	Litigation	\$185.00	62.10	\$11,488.50

11. The paraprofessionals of WKMB who have rendered professional services in these cases during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Barbara Banks	Paralegal	4 Years	Litigation	\$130.00	201.00	\$26,130.00
Darlene Boozer	Legal Clerk	1 Year	Litigation	\$95.00	131.30	\$12,473.50
Natasha Bynum	Legal Clerk	1.5 Years	Litigation	\$95.00	120.90	\$11,485.00
Mahmoude Moasser	Paralegal	10 Years	Litigation	\$130.00	46.50	\$6,045.00
Rebecca Mitchell	Paralegal	1.5 Years	Litigation	\$115.00	0.40	\$46.00
Tonya Manago	Senior Paralegal	5 Years	Litigation	\$130.00	7.70	\$1,001.00
Paul Pittman	Paralegal	2 Years	Litigation	\$115.00	2.30	\$264.50
Reilly Smith	Paralegal	6 Months	Litigation	\$115.00	30.30	\$3,848.50

Grand Total for Fees: 289,591.50
Less 40% Discount: (112,661.40)
Less Payment: (50,000.00)

Total Due \$126,930.10

12. WKMB has advised and represented the Debtors in connection with certain litigation and environmental matters. These matters include the Honeywell litigation, cost recovery litigation against other private parties and representation of the Debtors before the U.S. Environmental Protection Agency in connection with the Libby, Montana asbestos remediation matter.

13. The rates described above are WKMB 's hourly rates for services of this type. Attached as Exhibit A is a detailed itemization and description of the services that WKMB rendered during this Fee Period. Based on these rates and the services performed by each individual, the

reasonable value of such services is \$289,591.50. The WKMB attorneys and paraprofessionals expended a total of 1306.4 hours for these cases during this Fee Period. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount of fees requested is fair and reasonable given: (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

14. Further, Exhibit A (a) identifies the individuals that rendered services in each Subject Matter, as defined and described below, (b) describes each activity or service that each individual performed and (c) states the number of hours (in increments of one-tenth of an hour) spent by each individual providing the services. Each numbered tab in Exhibit A corresponds to the matter number that WKMB assigned to each Subject Matter. If a Subject Matter does not appear, then WKMB did not bill time or expenses for that Subject Matter during this Fee Period, but may bill time for that Subject Matter in the future.

Reasonable and Necessary Services Rendered by WKMB

Categorized by Matter

15. The professional services that WKMB rendered during the Fee Period are grouped into the numbered and titled categories of subject matters described in Paragraphs 15-19 herein (the "Subject Matter(s)").

16. Matter 6 – Honeywell litigation

(Fees: \$281,683.50; Hours: 1287.50)

This Subject Matter involves time spent in litigation against Honeywell International, Inc. to recover substantial costs and damages and to compel Honeywell to clean up nearly a million tons of chromium process waste disposed of by a Honeywell predecessor, Mutual Chemical Company. Included is time preparing and filing motions, working on fact and expert discovery, undertaking factual and legal research and analysis and attending court hearings.

17. Matter 9 – Libby, Montana

(Fees: \$4,242.00; Hours:10.10)

This Subject Matter describes activities concerning the representation of the Debtors before the U.S. Environmental Protection Agency relating to EPA's enforcement action concerning asbestos at Libby, Montana. Included is time for meetings with EPA and strategic planning.

18. Matter 10 - Fee Application

(Fees: \$3,696.00; Hours: 8.80)

This Subject Matter is for time spent for the preparation of the fee applications for May and June.

Actual and Necessary Expenses

19. It is WKMB's policy to charge its clients in all areas of practice for identifiable non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. It is WKMB's policy to charge its clients only the amount actually incurred by WKMB in connection with such items. Examples of such expenses are postage, overnight mail, courier delivery, transportation, overtime expenses, computer assisted legal research, photocopying, out-going facsimile transmissions, airfare, meals,

and lodging. With respect to airfare expenses, all travel, by all individuals, is billed at the coach class rate with allowances for class upgrades.

20. WKMB charges: (a) \$0.15 per page for duplication and (b) \$0.75 per page for outgoing telecopier transmissions (plus related toll charges). WKMB does not charge its clients for incoming telecopier transmissions. WKMB has negotiated a discounted rate for Lexis and Westlaw computer assisted legal research, which is approximately \$125/hour of online use of the standard Westlaw databases and approximately \$3.00/minute for Lexis databases. Computer assisted legal research is used whenever the researcher determines that using Lexis/Westlaw is more cost effective than using traditional (non-computer-based legal research) techniques.

21. A summary of expenses by type, as well as a detailed itemization and description of the disbursements made by WKMB on the Debtors' behalf during the Fee Period is attached hereto as Exhibit B. All of these disbursements comprise the requested sum for WKMB out-of-pocket expenses, totaling \$52,387.36. These disbursements are grouped in Exhibit B into the same numbered and titled categories of Subject Matters as the fees are grouped in Exhibit A. The numbered tabs within Exhibit B correspond to the numbers assigned to the matters described in Paragraphs 15-19 herein. Any missing Subject Matters merely indicate that no expenses were attributed to such Subject Matters during the Fee Period, although expenses may be attributable to such Subject Matters in the future. A summary of expenses by category for the entire Fee Period is also set forth in Exhibit B.

Representations

22. WKMB believes that the Application is in compliance with the requirements of Del.Bankr.LR 2016-2.

23. Although every effort has been made to include all fees and expenses from the Fee Period in the Application, some fees and expenses from the Fee Period might not be included in the Application due to accounting and processing delays. WKMB reserves the right to make further application to the Court for allowance of fees and expenses for the Fee Period not included herein.

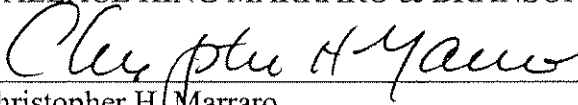
24. In summary, by the Application, WKMB requests compensation for fees and expenses in the total amount of \$341,978.86, consisting of (a) \$289,591.50 for reasonable and necessary professional services rendered and (b) \$52,387.36 for actual and necessary costs and expenses.

WHEREFORE, WKMB respectfully requests (a) that an allowance be made to it, as fully described above for the (i) 80% of the reasonable and necessary professional services WKMB has rendered to the Debtors during the Fee Period (\$101,544.08 after credits and payments) and (ii) 100% of the reimbursement of actual and necessary costs and expenses incurred by WKMB during the Fee Period (\$52,387.36); (b) that both fees and expenses are payable as administrative expenses of the Debtors' estates; and (c) that this Court grant such further relief as is equitable and just.

Washington, D.C.
Dated: August 28, 2001

Respectfully submitted,

WALLACE KING MARRARO & BRANSON PLLC



Christopher H. Marraro
1050 Thomas Jefferson Street N.W.
Washington, D.C. 20007
(202) 204-1000

EXHIBIT A

MATTER 6 - HONEYWELL

FEES - JULY 2001

Wallace
King
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

August 28, 2001

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12283

For Professional Services Rendered in Connection with Honeywell Litigation - Matter 6

Professional Services:

		<u>Hours</u>
07/02/01 DB	Review and organize new production documents and integrate into case files (4.5 hrs.).	4.50
CHM	Review Dr. Costa's lab notes (.2 hrs.); prepare cover letter to Mr. Caffrey re same (.1 hrs.); review Honeywell summary judgment motion on CERCLA issues (1.2 hrs.); conference with P. Condrón re response to statute of limitations and entire controversy points (.8 hrs.); review entire controversy section of draft brief (.8 hrs.); further conference with J. Agnello re same (.5 hrs.).	3.60
PCC	Edit Grace summary opposition brief re Grace 7 Co. issues.	1.50
TP	Office conference with Ms. Banks re expert document production to Grace (.2 hrs.); reviewed the status of confirmation of what documents were produced at Mr. Agnello's office to Honeywell counsel and drafted	2.30

W. R. Grace & Co.

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Hours

responsive comments for chart confirming production of documents Honeywell claimed were missing (1.7 hrs.); telephone conference with Ms. Flax and EedEx regarding the missing box of documents and provided further description to FedEx to use in efforts to locate box (.4 hrs.).

07/02/01	AP	Research and draft brief in opposition to summary judgment on law of case and limitations issues.	7.00
	BB	Continue incorporating new pleadings, case documents and correspondence into indexed case files and electronic files and scan same (9.3 hrs.); consult with Ms. Parker re status of shipment of expert supporting documents from local counsel (.1 hrs.).	9.40
07/03/01	DB	Continue to review, organize and quality check new production documents and integrate into case files (7.0 hrs.); prepare FedEx package to case expert for Ms. Banks (.5 hrs.).	7.50
	AP	Research and draft statement of facts for brief in opposition to summary judgment (6.5 hrs.); research statute of limitations argument (4.5 hrs.).	11.00
	TP	Office conferences with Ms. Banks and Mr. Marraro (.3 hrs.); review status of confirming documents produced to Honeywell and made appropriate edits to summary chart of what documents have been confirmed produced (1.0 hrs.); reviewed correspondence from Mr. Boenning re expert document production and other case related correspondence including letters re request to serve motion papers out of time filed by Rhone and letters related to production of documents from Honeywell	3.00

W. R. Grace & Co.

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		<u>Hours</u>
	expert witnesses Rifkin and Montgomery (.6 hrs.); compared Rifkin's and Walter's reference lists to documents sent and separated the documents accordingly to assist Mr. Marraro in preparing for depositions (1.1 hrs.).	
07/03/01 NAB	File and index case documents.	4.00
BB	Review, analyze and quality check returned supporting documents to expert reports for Ms. Parker and Mr. Marraro and prepare chart of findings (1.8 hrs.); collect and prepare pertinent documents for Mr. Marraro and Ms. Pelletier (3.0 hrs.); forward calendar reminder re filing of Appendix N case attorneys, expert and staff (.1 hrs.); scan and incorporate pertinent bankruptcy documents into electronic case files (1.1 hrs.); consult with Ms. Pelletier re assignment (.1 hrs.); research and collect pertinent exhibits for reply brief of Ms. Pelletier (5.4 hrs.).	11.50
PCC	Edit Grace opposition brief.	1.50
ACZ	Reviewed and revised sections of opposition brief to Honeywell's summary judgment motion pertaining to CERCLA and N.J. Spill Act claims.	2.90
CHM	Revise and edit 56.1 statement to accompany opposition brief.	1.30
07/04/01 PCC	Edit Grace opposition brief.	2.00
07/05/01 CHM	Conference with D. Shelnutt re deposition preparation questions for Dr. Rifkin (1.0); review questions from Dr. Nye re Rifkin preparation (.7); review two of four binders in preparation for Rifkin deposition (3.5 hrs.).	5.20

W. R. Grace & Co.

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		<u>Hours</u>
07/05/01	NAB File and index case documents (2.0 hrs.); scan case documents to server (2.0 hrs.)	6.80
	DB Coordinate and prepare for production of expert supporting documents and integrate into case files (4.5 hrs.); review and organize supplemental supporting documents and integrate into case files (3.0 hrs.).	7.50
	ACZ Review proposed revisions to summary judgment brief for N.J. Spill Act claim and conduct research regarding same (3.1); discussions with B. Hughes regarding research and revisions to brief (.8); locate and review documents that support declaration and brief, including RCRA manifests and related invoices (.3)	4.20
	WH Conferences with Messrs. Marraro and Condron and Ms. Pelletier re opposition briefs (1.4); review and comment on Mr. Zacaroli's CERCLA section of opposition brief (1.8); legal research in support of CERCLA issues (2.1); assist Mr. Miller in preparing declaration re CERCLA response costs and review documents to be used in support of same (2.7); confer with Mr. Miller and Ms. Parker re revisions to Miller declaration and collecting exhibits in support of same (.8).	8.80
	PCC Edit CERCLA sections of brief (4.0 hrs.); office conference with Mr. Marraro re brief (.2 hrs.); draft "standing" section (2.0 hrs.); review law on "third party" defense and CERCLA Section 107 (2.0 hrs.); revise brief (1.3 hrs.).	9.50
	AP Draft letter to P. Chapman regarding verification and signing of transcript (.4); draft statement of facts for brief in opposition to summary judgment (2.0); research statute of	6.40

W. R. Grace & Co.

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		<u>Hours</u>
	limitations cases re Spill Act for brief in opposition to Summary Judgment (4.0).	
07/05/01 BB	Confirm and update case calendar re depositions, arrange for court reporters and email same to case attorneys, local counsel and case experts (.4 hrs.); collect and prepare pertinent documents for Ms. Pelletier in re reply 56.1 statement (2.7 hrs.); collect and prepare and send pertinent documents for Mr. Hughes (1.8 hrs.); consult with Mr. Zacaroli re declaration (.1 hrs.); research production database and collect and prepare pertinent documents for exhibits to declaration for Messrs. Hughes and Zacaroli (3.3 hrs.); review and cross-reference produced expert supporting documents and original set (2.9 hrs.).	11.20
07/06/01 CHM	Review binders 3-4 of Rifkin documents for deposition (3.0); review and work counter statement of facts and re-revised 56.1 statement for brief (4.6).	7.60
AP	Research and began compilation of appendix to summary judgment.	9.00
ACZ	Review and provide revisions to brief in opposition of Honeywell summary judgment motion for CERCLA claims; organize attachments and declaration for same.	0.90
FPP	Convert photographs into electronic format (.8 hrs.); convert electronic photographs into commonly used viewing format (1.5 hrs.).	2.30
WH	Conferences with Ms. Parker and Mr. Zacaroli re revisions to Miller declaration and exhibits to same re CERCLA response cost issue (1.7); legal research in support of opposition to Honeywell's summary judgment motion on	8.10

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		<u>Hours</u>
	Spill Act claim (2.8); work on section of opposition brief re Spill Act claims (3.2); confer with Mr. Marraro and Ms. Flax re summary judgment opposition brief (.4).	
07/06/01 NAB	Scan case documents to server (2.8 hrs.); file and index case documents (4.2 hrs.).	7.00
DB	Review and organize new production documents and integrate into case files (3.0 hrs.); prepare and coordinate expert supporting documents and integrate into case files (4.0 hrs.).	7.00
PCC	Revise brief (7.0 hrs.); telephone conference with Mr. Agnello and Ms. Flax re briefing issues (.5 hrs.); office conference with Mr. Zacaroli re CERCLA section of brief (.5 hrs.); telephone conference with Mr. Hughes (.2 hrs.).	8.20
BB	Complete cross-referencing returned expert supporting documents and prepare summary report and consult with Ms. Parker re same (1.8 hrs.); collect and prepare exhibits for declaration and consult with Mr. Zacaroli re same (.8 hrs.); follow up on research for pertinent information re reply brief for Ms. Pelletier (.5 hrs.); prepare additional supplemental supporting documents for production for Ms. Parker (.8 hrs.); collect and prepare exhibits for reply brief for Ms. Pelletier and Mr. Condon (2.0 hrs.); research the internet and make telephone calls to verify currently operating businesses bordering north of the Grace site in preparation of reply summary judgment briefs for Ms. Pelletier (2.0 hrs.); prepare supplement production of expert supporting documents (1.0 hrs.); research production database, files and CDs for documents pertinent to reply summary	14.20

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		<u>Hours</u>
	judgment briefs and prepare exhibits for Ms. Pelletier (5.3 hrs.).	
07/06/01 TP	Office conference and email with Ms. Banks (.2 hrs.); reviewed confirmation information she gathered re documents produced and made appropriate entries in chart (work product with Bates numbers and one to be sent to Honeywell without Bates numbers) responding document by document to Honeywell's assertion of missing documents (.9 hrs.); reviewed case related correspondence including articles re dermal effects of chromium (2.7 hrs.); draft letter to Mr. Field re history of production and summarizing efforts to confirm all documents have been produced (1.1 hrs.); telephone conference and emails with Mr. Miller re his declaration and made requested changes to same (1.0 hrs.).	5.60
07/07/01 DB	Prepare and coordinate expert supporting documents and integrate into case files (4.0 hrs.); review and organize new production documents and integrate into case files (3.0 hrs.).	7.00
AP	Conference regarding compilation of summary judgment appendix and supervision of paralegal staff.	3.00
BB	Consult with Ms. Pelletier re assignment (.2 hrs.); research files, collect and prepare documents for appendix to brief in opposition to defendant's summary judgment motion (5.5 hrs.); prepare contents and cover pages (.7 hrs.); proof read draft brief, research Westlaw and cite check citations and send email message re findings to Ms. Pelletier and Mr. Condron (1.9 hrs.).	8.30

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		<u>Hours</u>	
07/08/01	PCC	Revise brief in opposition to summary judgment (2.7 hrs.); telephone conference with Mr. Hughes re brief (.3 hrs.).	3.00
	WH	Prepare for deposition of Gary Walter, Honeywell's groundwater expert (5.1 hrs.); work on CERCLA and Spill Act sections of opposition brief (2.1 hrs.).	7.20
	TP	Reviewed case related correspondence including letters re depositions schedules, bankruptcy court rules, requests for documents in other case involving Allied (.3 hrs.); prepare letter to NJDEP re expert reports in current litigation (.6 hrs.).	0.90
	CHM	Edit Grace opposition brief (4.2 hrs.).	4.20
07/09/01	TP	Office conference with Mr. Hughes (.2 hrs.); reviewed invoices and manifests (.5 hrs.); several phone calls with Mr. Miller re revising his declaration re to added costs due to commingling of gasoline and chromium (.3 hrs.); requested revisions to declaration as a result of information obtained in calls and documents (.9 hrs.); modified draft of letter summarizing Grace's efforts to confirm production of expert documents (.3 hrs.); confirmed status of expert documents produced by comparing production set and gather those that may have been omitted by requesting from National Library of Medicine and Ms. Busbea and made changes to summary chart where appropriate and office conference with Mr. Marraro to provide update on status of this project (3.5 hrs.); telephone conference with FedEx re missing box of documents (.2 hrs.); reviewed incoming correspondence re Dr.	6.10

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		<u>Hours</u>
	Bruce documents and authorization for representation (.2 hrs.).	
07/09/01 PCC	Revise Rule 56.1 counterstatement of material facts (5.5 hrs.); various conferences calls with Mr. Agnello and Ms. Flax re brief arguments (1.0 hrs.); finalize briefs for filing (2.0 hrs.); review record citations (2.0 hrs.).	10.50
WH	Work on opposition to Honeywell's motion for partial summary judgment (3.6 hrs.); review documents in preparation for Gary Walter's expert deposition on site groundwater and remediation issues (5.7 hrs.); conference with Andy Davis re questions/issues for Walters deposition and review Dr. Davis' outline of deposition questions (1.4 hrs.)	9.80
BB	Coordinate and prepare exhibits to opposition to summary judgment and prepare for filing (14.3 hrs.).	14.30
CHM	Complete review of final brief including edits (2.0 hrs.); conference calls with J. Agnello (1.6 hrs.); conference call with client (.8 hrs.); prepare modifications to declarations (.5 hrs.); revise and edit 56.1 statement; review appendix materials (1.0 hrs.).	5.90
RM	Review documents for Ms. Pelletier to confirm production of a particular document.	0.40
RLS	Office conference with Ms. Banks regarding Gary Walter's expert report (.1 hrs.); review and incorporate new correspondence into case file and update index accordingly (.7 hrs.); review attachments to Gary Walter's report (.6 hrs.); organize Gary Walter's expert report for Mr. Hughes (.3 hrs.).	1.70

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		<u>Hours</u>
07/09/01	NAB Review, file and index case documents ((4.0 hrs.); scan case documents to server (3.1 hrs.).	7.10
	AP Finalize, citecheck and serve brief (12.7 hrs.); review and finalize appendix in opposition to summary judgment (2.0 hrs.).	14.70
	DB Review and organize new production documents and integrate into case files (4.5 hrs.).	4.50
	MM Review various e-mails received from Ms. Banks re reply briefs and filing of appendix packages on 7/23/01 (.2 hrs.); revised case calendar (.1 hrs.).	0.30
07/10/01	CHM Conference call with A. Nye re further deposition questions (1.2 hrs.); prepare deposition outline for Rifkin (5.4 hrs.); conference with M. Costa re Rifkin deposition (.5 hrs.); conference with Ms. Millian re Rifkin depositions (.5 hrs.); conference call with J. Agnello re motion to strike (.8 hrs.); review and edit revised 56.1 statement (.3 hrs.).	8.50
	ACZ Discussion with B. Hughes regarding research needed for response to Honeywell's NCP consistency argument.	0.30
	BB Review, sort and organize new case correspondence and pleadings and case documents (1.0 hrs.); consult with Ms. Parker re supplemental expert supporting documents and prepare same for production (.8 hrs.); prepare amended 56.1 Statement of Facts for filing for Ms. Pelletier and Mr. Marraro (.5 hrs.); place telephone call and email court reporter to confirm deposition schedule and email changes to attorneys, local counsel and case expert (.2 hrs.); research case files,	5.50

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		<u>Hours</u>
	production database and CDs for pertinent documents for rebuttal expert deposition for Mr. Marraro (2.5 hrs.); ship pertinent documents (.5 hrs.).	
07/10/01 TP	Telephone conference with Ms. Van Middleworth re documents that Honeywell claims were not produced that were relied upon by A. Davis and reviewed materials she faxed in response to requests (1.3 hrs.); reviewed Deming expert report for list of documents considered, compared with documents in files and emails with Ms. Banks and Mr. Hughes re documents that were not produced (1.1 hrs.); prepared letter to Mr. Caffrey with additional documents from Mr. Davis (.4 hrs.); revised draft letter re status of production of expert documents and sent draft to Mr. Marraro (.5 hrs.).	3.30
WH	Prepare for and take Gary Walters' deposition in Roseland, NJ (10.2 hrs.); work on finalizing Grace's opposition briefs (1.3 hrs.).	11.40
AP	Review Honeywell brief re our motions for summary judgment re Grace & Co. (.8 hrs.); meeting regarding motion to strike and Rule 56.1 statement (.5 hrs.); revise and serve amended Rule 56.1 statement (2.0 hrs.); prepare for deposition of Todd Delaney (3.2 hrs.).	6.50
RLS	Review and incorporate new correspondence into the case file (4.5 hrs.); update case indices accordingly (1.5 hrs.).	6.00
DB	Integrate expert supporting documents into case files.	4.00

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		<u>Hours</u>
07/10/01	NAB Review, file and index case documents (7.4 hrs.); scan case documents to server (2.1 hrs.).	9.50
	TM Cross-referenced documents produced by our Max Costa to determine which documents had been produced to opposing counsel and what documents still need to be produced (1.3 hrs.); prepared binders of deposition material for Mr. Marraro for the deposition of Mr. Rifkin (2.6 hrs.); analyzed Costa expert report to determine if any documents were cited that were not listed on his reference list (.8 hrs.).	4.70
	PCC Revise language for Rule 56.1 statement (.8 hrs.); telephone conference with Messrs. Marraro and Agnello re motion to strike and revision of Rule 56.1 statement (.5 hrs.).	1.30
07/11/01	BB Collect, prepare and fax pertinent documents for ongoing deposition for Mr. Marraro (.5 hrs.); review and analyze new case correspondence, supplemental expert supporting documents and pleadings and incorporate into case files and produce supplemental expert supporting documents (5.0 hrs.); collect and prepare pertinent documents for deposition for Mr. Hughes (2.0 hrs.); place calls to opposing counsel and court reporter re deposition schedule changes for Mr. Hughes (.3 hrs.).	7.80
	WH Read and analyze Honeywell's six opposition briefs to Grace's motions for summary judgment (4.8 hrs.); begin working on reply briefs (2.1 hrs.); prepare for deposition of Honeywell's remediation expert, Bruce James (2.7 hrs.).	9.60

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		<u>Hours</u>
07/11/01 DB	Prepare and copy expert reports (8.3 hrs.); review and organize new production documents (4.0 hrs.).	12.30
AP	Review documents in preparation for deposition of Todd Delaney (6.5 hrs.); draft outline for same (3.5 hrs.).	10.00
TP	Telephone conferences with Mr. Boenning and left messages for Mr. Caffrey re report from Parsons' Engineering relied upon by Demming that was not produced and requested production (.6 hrs.); office conference with Mr. Marraro re preparing and defending Dr. Costa and requested that all Costa materials be copied in preparation (.4 hrs.); made edits to chart re production of expert documents after confirming additional documents produced (.7 hrs.); telephone conference and email with Ms. Busbea re article listed by Dr. Costa (.4 hrs.); reviewed incoming correspondence including plans to develop waterfront, opposition briefs, deposition notices and correspondence with Court re schedule for briefing (1.8 hrs.).	3.90
NAB	File and index case pleadings and correspondence (3.1 hrs.); label boxes of case documents (2.0 hrs.).	5.10
RLS	Review and incorporate new correspondence into the case file (5.2 hrs.); update case file accordingly (2.1 hrs.).	7.30
CHM	Attend Rifkin deposition (8.5 hrs.); meeting with Drs. Shelnut and Nye re deposition issues regarding Rifkin (1.8 hrs.);	10.30
07/12/01 NAB	Bates label and copy documents from the Davis deposition to be sent to expert (4.1 hrs.); bates label and copy supplemental documents	4.10

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		<u>Hours</u>
	to be sent to expert (3.9 hrs.); review, file and index case documents (1.8 hrs.); scan case documents to server (1.8 hrs.).	
07/12/01 AP	Preparation for Delaney deposition (4.0 hrs.); depose Honeywell expert, Todd Delaney (7.5 hrs.); review transcripts of Chapman and Anderson depositions (3.5 hrs.).	15.00
DB	Research production set for relevant documents for expert depositions (4.0 hrs.); collect and prepare expert files (4.5 hrs.).	8.50
RLS	Review and incorporate new correspondence into the case file.	2.00
ACZ	Review Honeywell argument in response to Grace's motion for summary judgment on strict liability claim (.7 hrs.); discussion with B. Hughes regarding Honeywell war-time argument in its response to Grace's strict liability claim and research and review of case law and documents needed related to this argument (1.1 hrs.); additional research on NCP consistency for reply to Honeywell's response to Grace's CERCLA summary judgment motion (.7 hrs.).	2.50
TP	Office conference with Mr. Hughes re research re assumption of risk and degree of knowledge required (.6 hrs.); call to Mr. Miller re name of person in accounting (.1 hrs.).	0.70
CHM	Conference with M. Flax re Honeywell opposition to license agreement and strict liability (.5 hrs.); meeting with A. Nye and S. Shelnutt re next steps (.6 hrs.); attend Rifkin deposition (8.0 hrs.); prepare memo to file regarding key points in deposition (1.5 hrs.).	10.60

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		<u>Hours</u>
07/12/01 BB	Consult with Mr. Hughes by telephone re research assignment in preparation for reply brief (.2 hrs.); research case depositions for pertinent language in preparation for reply briefs for Mr. Hughes (3.7 hrs.); research historical documents for pertinent information in preparation for reply brief for Mr. Hughes (5.8 hrs.); prepare and produce supplemental expert supporting documents for Ms. Parker; incorporate same into case files (4.6 hrs.).	14.30
WH	Review documents and confer with Messrs. Brown and Gollaway in preparation for deposition of Bruce James (8.6 hrs.)	8.60
07/13/01 WH	Finish preparation for Bruce James' deposition (1.7 hrs.); take James deposition (8.6 hrs.).	10.30
NAB	Locate and copy documents from the Brown and GRA productions per Ms. Parkers request (2.1 hrs.); bates label and copy supplemental documents to be sent to expert (5.4 hrs.).	7.50
PCC	Draft memo re information needed for Grace & Co. summary judgment brief.	0.30
TM	Analyze and incorporate new case correspondence, pleadings, documents and reports into case files (1.8 hrs.); consult with Ms. Parker re supplemental expert documents (.2 hrs.); prepare and label same for production (1.0 hrs.).	3.00
CHM	Prepare letter to D. Field on expert document production (1.2 hrs.); read and make assignments on Honeywell opposition briefs (6.8 hrs.).	8.00

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		<u>Hours</u>
07/13/01 TP	Office conference with Mr. Marraro updating progress on confirming production of documents (.5 hrs.); finalized summary chart of production (1.6 hrs.); telephone conference with Mr. Miller re Mr. Garvey information on transaction of ECARG and standard reports (1.1 hrs.); research re cases cited by plaintiffs re strict liability and assumption of risk and Westlaw searches re same (4.9 hrs.); telephone conference with Mr. Hughes and follow-up call to Mr. Boenning re Parson's report still not produced (.2 hrs.); call from Ms. Busbea re information on documents sent from Dr. Costa (.2 hrs.).	8.50
07/14/01 TP	Reviewed Rifkin report and articles by Dr. Costa in preparation for Costa deposition.	2.90
07/15/01 CHM	Review and assess two boxes of documents from AAA for Wells deposition (6.4 hrs.); prepare outline for Wells deposition (3.0 hrs.).	9.40
07/16/01 DB	Researching case files for document in preparation of deposition of Honeywell expert (4.0 hrs.); preparation of billings including pulling and copying expert reports (4.5 hrs.).	8.50
BB	Continue incorporating new pleadings, case documents and correspondence into indexed case files (8.9 hrs.); consult with Ms. Parker re status of shipment of expert supporting documents from local counsel (.5 hrs.).	9.40
RLS	Review and incorporate new correspondence into the case file.	2.80

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		<u>Hours</u>
07/16/01	CHM Review Costa documents (1.8); lengthy prep session for Costa deposition (5.4); meeting with J. Agnello to assist with preparation for Hart deposition (1.0 hrs.).	8.20
	ACZ Discussions with B. Hughes regarding remaining research needs and language for strict liability brief (.7 hrs.); additional research on NCP consistency under CERCLA for reply brief (.7 hrs.); review of Honeywell strict liability brief and additional research on liability when government compels a facility to take certain action (1.9 hrs.).	3.30
	AP Review Honeywell briefs in opposition to summary judgment (2.3 hrs.); meet with B. Hughes regarding briefing schedule and assignments for reply briefs (.9 hrs.); conference with B. Banks re filing of brief and compilation of additional exhibits in support of briefs (1.0 hrs.); research for reply brief regarding CERCLA and NCP consistency (1.8 hrs.).	6.00
	WH Review Mueser Rutledge documents in preparation for deposition of Honeywell's geotechnical/heaving expert, Peter Deming (4.2 hrs.); work on summary judgment reply briefs (5.4 hrs.).	9.60
	NAB Review, file and index case documents.	2.00
	MM Office conference with Mr. Hughes re preparing of filing in New Jersey (.1 hrs.); office conference with Ms. Pelletier re producing copies of recently filed Honeywell briefs (.1 hrs.); search case material and produce same to Ms. Pelletier (1.0 hrs.);	1.70

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		<u>Hours</u>
	conference with Ms. Pelletier re Gayle Koch's deposition and preparation (.5 hrs.).	
07/16/01 TP	Reviewed Dr. Costa's report and references (3.0 hrs.); met with Dr. Costa, Mr. Marraro, Dr. Goad to prepare Dr. Costa for deposition (5.4 hrs.).	8.40
07/17/01 AP	Calls with F. Boenning and G. Koch re scheduling Koch deposition (.5 hrs.); research application of statute of limitations to CERCLA in preparation for reply brief (3.5 hrs.).	4.00
PCC	Draft reply brief on Grace & Co. and Grace Ltd. summary judgment motion.	5.50
DB	Continue researching case files for documents in preparation of deposition of Honeywell experts (4.0 hrs.); preparation of binders, pulling and copying expert files (4.5 hrs.).	8.50
WH	Prepare for Peter Deming deposition (3.6 hrs.); work on summary judgment reply briefs (6.8 hrs.).	10.40
CHM	Take deposition of Honeywell expert, Mr. Wells (8.5 hrs.); review first draft of Grace & Co. summary judgment reply brief (.6 hrs.).	9.10
ACZ	Additional research on New Jersey case law on strict liability and case law regarding defenses to strict liability where government allegedly compels action (1.6 hrs.); draft language for strict liability reply brief on lack of merit and relevance of Honeywell's government war-time involvement on lack of relevance of state riparian grants on strict liability, and on other issues (6.9 hrs.); review state riparian grants to	9.30

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		<u>Hours</u>
	Mutual Chemical for authorization to dump chromium (.8 hrs.).	
07/17/01 BB	Collect and prepare supporting documents for 7/19/01 deposition for Ms. Pelletier and prepare package of same (.5 hrs.); review, analyze, organize, prepare and incorporate new correspondence, pleadings and case documents into case files and create new case files (6.5 hrs.); scan new pleadings and documents and install in electronic files and deposition into Summation and electronic files (1.4 hrs.); prepare documents for shipment to local counsel for deposition (.6 hrs.).	9.00
RLS	Office conference with Mmes. Manago, Banks and Pelletier (.2 hrs.); reiew documents in order to determine whether they have previously been produced (2.8 hrs.).	3.00
NAB	Scan case documents to server (2.6 hrs.).	2.60
TP	Office conference with Mr. Marraro re Dr. Costa's deposition (.2 hrs.); telephone conference with Ms. Banks re Honeywell production of documents for upcoming expert deposition (.2 hrs.); final meeting with Dr. Costa prior to start of deposition and defended deposition (5.9 hrs.); reviewed cases re government authorization of activity in defense of strict liability claim (1.4 hrs.).	7.70
07/18/01 DB	Review and organize new production documents (4.0 hrs.); integrate documents into ase files and prepared expert supporting documents (8.5 hrs.).	12.50
WH	Prepare for Deming deposition (4.1 hrs.); work on summary judgment reply briefs (5.8 hrs.).	9.90

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		<u>Hours</u>
07/18/01 BB	Consult with Mr. Marraro re research assignment (.1 hrs.); research case files and prepare pertinent correspondence between NJDEP and defendant for Mr. Marraro (5.6 hrs.); consult with Mr. Marraro re same (.1 hrs.); provide guidance re incorporation of new pleadings into case files to litigation clerk (.3 hrs.); consult with Mr. Hughes and collect and prepare pertinent documents (.7 hrs.); prepare letter and fax to all counsel of record for Mr. Hughes re re-scheduled deposition (.5 hrs.); place call to case expert re research request for Mr. Marraro (.1 hrs.).	7.40
NAB	Review, index and scan case new pleadings.	7.50
AP	Conference with C. Marraro and clients regarding Grace accounting (3.0 hrs.); outline and draft CERCLA reply brief (2.9 hrs.).	5.90
AFK	Research re assumption of risk and strict liability in New Jersey (1.2); telephone conference with Mr. Marraro re same (0.1); draft e-mail to Mr. Hughes re same (0.2).	1.50
CHM	Prepare letter to D. Field re additional witnesses for deposition of American Appraisal Associates (1.2 hrs.); prepare introduction to CERCLA 113 and 107 briefs (2.5 hrs.); research cases on "incurred costs" (1.5 hrs.).	5.20
ACZ	Draft language for strict liability response brief (3.4 hrs.); research case law on CERCLA costs (3.6 hrs.); research of case law on CERCLA statute of limitations on "contribution" (2.9 hrs.); research Supreme Court law fthat the plain language of a statute controls (1.1 hrs.).	11.00

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		<u>Hours</u>
07/18/01 TP	Read incoming case correspondence (.9 hrs.); drafted argument responding to Honeywell's argument that they are not liable because Grace assumed the risk of contamination and research re same (6.7 hrs.); reviewed Honeywell opposition briefs (1.1 hrs.).	8.70
RLS	Review documents to determine whether they had been previously produced.	3.50
PCC	Drafting reply brief re Grace Ltd. and Grace & Co. summary judgment motion.	1.00
07/19/01 BB	Research production database and case files for documents pertinent to reply briefs for Messrs. Marraro and Hughes (.7 hrs.); research Westlaw and Lexis for relevant case law and shepardize each for Mr. Hughes (1.2 hrs.); research production database and case files for pertinent expert supporting document for Ms. Flax re ongoing expert deposition (.7 hrs.); prepare cover letter and deposition errata sheets for court reporter and prepare fax for all counsel of record re same (.8 hrs.); read and analyze new correspondence and prepare for incorporation into case files (3.8 hrs.); prepare and e-mail pertinent scanned pleadings for Mr. Marraro (.2 hrs.); prepare, organize and incorporate new case documents and pleadings into case files (4.6 hrs.).	12.00
ACZ	Research CERCLA case law on payment of response costs paid in first instance by parent corporation under CERCLA for reply briefs (4.4 hrs.); research the definition of "incur" under CERCLA and under NCP-consistency regulations for reply briefs (2.9 hrs.); research case law on whether NCP consistency is a necessary element to establish the liability of a	9.60

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		<u>Hours</u>
	party under CERCLA on summary judgment for reply briefs (2.3 hrs.).	
07/19/01 WH	Work on summary judgment reply briefs (10.3 hrs.).	10.30
AP	Research and draft portion of reply brief regarding NCP consistency.	7.80
CHM	Conference with J. Agnello re Hart deposition and documents to be used at deposition (.8 hrs.); prepare section 113 brief (3.5 hrs.); conference with client (1.5 hrs.); conference with M. Flax re license agreement brief (.5 hrs.) review files on petroleum cleanup re incremental costs and state orders (1.2 hrs.).	7.90
RLS	Review and create labels for the boxes of documents in the case room.	3.50
TP	Read Honeywell letter to NJDEP (.2 hrs.); drafted argument that Honeywell is not protected by government contractor defense (3.4 hrs.); office conference with Ms. Banks re documents produced by Dr. Costa at his deposition (.2 hrs.).	3.80
MM	Office conferences with Mr. Marraro, Ms. Banks and Ms. Pelletier re preparation for filing reply briefs in 7/23/01 with Ms. Flax's office (.2 hrs.); telephone conference with Ms. Flax re same(.2 hrs.); review various drafts of briefs and other case documents in preparation for stated filing (.3 hrs.).	0.70
NAB	Scan pleadings into server (7.5 hrs.); file and index new correspondence and case files (1.7 hrs.).	9.20

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		<u>Hours</u>
07/20/01 BB	Consult with case expert by telephone re research for production documents relevant to preparation of expert for deposition for Mr. Marraro (.2 hrs.); research case files, collect, analyze and discuss pertinent documents with expert by telephone (1.8 hrs.); consult with Mr. Hughes re preparation of appendices for reply brief (.2 hrs.); research Westlaw and prepare pertinent case law for Mr. Hughes re reply brief (.9 hrs.); research FRCP 56.1 and appropriate local federal rules re filing requirements for Mr. Hughes and Ms. Pelletier (.6 hrs.); research production database and case files for pertinent documents (.7 hrs.); research case files, collect and prepare pertinent produced documents re declaration for Ms. Pelletier (2.3 hrs.); prepare and incorporate new pleadings into case files and create new files (1.3 hrs.); collect supporting documents to defendants' expert and case expert for Ms. Flax and prepare for shipment (1.5 hrs.).	9.50
RLS	Office conference with Mmes. Pelletier, Manago and Banks regarding attachments to Bill Miller's affidavit and search the produced documents in order to determine whether attachments were produced.	0.50
WH	Draft summary judgment reply brief re Grace's common law strict liability claim (8.8 hrs.); conferences with Mr. Condron and Ms. Pelletier re CERCLA reply briefs (.7 hrs.).	9.50
MM	Office conferences with Mr. Marraro, Ms. Pelletier, Ms. Banks and Mr. Hughes re various tasks to be completed in preparation of filing our rely briefs (.4 hrs.); search case material and produce copy of Michael Caffreys' 7/10/01 declaration with all exhibits to Ms. Pelletier for review (.3 hrs.); review various deeds and	5.70

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Hours

leases re producing lease (2.1 hrs.); follow-up office conference with Mr. Marraro and Ms. Pelletier re same (.2 hrs.); search Grace database and produce produced copy of stated lease and provide copy of same to Ms. Pelletier for review (2.3 hrs.); review Mr. Caffreys' 6/13/01 declaration re assuring stated lease had previously been produced (.2 hrs.); various other tasks in preparation (.2 hrs.).

07/20/01	ACZ	Additional research of CERCLA case law related to NCP consistency and the definition of "incur" for reply briefs (3.1 hrs.); review the statute of limitations defense argument raised by Honeywell in its brief in response to Grace's motion for summary judgment under CERCLA 107 (1.3 hrs.); discussions with C. Marraro, A. Pelletier, B. Hughes, P. Condrón regarding research findings and research assignments (1.1 hrs.); research New Jersey statutes and regulations requiring the removal of underground storage tanks, the definition of "removal" under N.J. statutes and related case law (3.4 hrs.).	8.90
	NAB	Scan pleadings into server.	6.50
	CHM	Prepare sections to 113 brief (4.5 hrs.); conferences re strategy on strict liability brief (1.0 hrs.); review and edit WWII section of strict liability brief (1.3 hrs.); work with P. Condrón on veil piercing issues (3.2 hrs.).	10.00
	PCC	Revise reply brief on Grace & Co. and Grace Ltd. summary judgment motion.	3.70
	AP	Call with G. Koch re upcoming scheduling (.3 hrs.); research and draft portion of CERCLA reply brief regarding "innocent purchaser" argument (4.1 hrs.); additional research	11.30

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Hours

regarding costs under NCP for inclusion in CERCLA reply brief (.9 hrs.); re-label document files to indicate whether each set produced (.5 hrs.); research and draft declaratory judgment portion of CERCLA reply brief (4.5 hrs.); additional research and redrafting of veil-piercing argument in CERCLA reply brief (1.0 hrs.).

07/20/01 TP	Researched and drafted memo re whether analysis of abnormally dangerous activity is based on time of disposal or time of litigation.	8.10
07/21/01 ACZ	Draft language for brief in reply to Honeywell's response to Grace's CERCLA 107 summary judgment motion (2.7 hrs.); research New Jersey hazardous waste disposal regulations for reply brief to Honeywell's response to Grace's CERCLA 113 summary judgment motion and related discussions with C. Marraro (3.1 hrs.); research case law on cost-effectiveness as a factor in determining appropriate remediation and cleanup remedies under CERCLA for purposes of replying to Honeywell's response to Grace's motion for summary judgment under CERCLA sections 113 and 107 (2.1 hrs.); review final strict liability brief for B. Hughes, discussions with B. Hughes regarding suggested revisions (1.3 hrs.).	9.20
AP	Review, revise, finalize and gather exhibits in support of CERCLA reply brief.	10.00
NAB	Pull and copy documents to be used in appendix to reply summary judgment briefs.	4.00
PCC	Revise briefs on corporate liability and license agreement.	5.00

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		<u>Hours</u>
07/21/01 MM	Office conferences with Mr. Marraro, Mr. Hughes and Ms. Pelletier re various task to be completed in preparation for our filing of briefs on 4/23/01 (1.2 hrs.); search various case material and produce copies of specific documents (i.e., correspondence, reports, etc.) to used in appendix (6.3 hrs.).	7.50
BB	Analyze draft briefs and identify exhibits (1.2 hrs.); research production database, CDs and case files for pertinent documents for appendix to reply summary judgment briefs (1.8 hrs.); collect, prepare, coordinate and organize documents for appendix (7.6 hrs.); consult with Messrs. Marraro and Hughes re appendices to summary judgment (.3 hrs.); collect, prepare and coordinate pertinent appendix documents for Mr. Marraro (.6 hrs.); create draft index of collected appendix documents to date (.5 hrs.).	12.00
WH	Revisions to strict liability summary judgment reply brief (8.8 hrs.); conferences with Ms. Pelletier re NCP and statute of limitations issues re CERCLA 107 reply brief and research re same (1.8 hrs.); review and provide comments on Grace Ltd. and Grace & Co. reply brief (1.3 hrs.); review and provide comments on Mr. Agnello's draft reply brief re license agreement (.7 hrs); draft inserts to brief re CERCLA "response cost" and "necessity" issues (3.2 hrs).	15.80
CHM	Research cases on issues for CERCLA section 113 brief (3.5 hrs.); draft declaratory judgment section to reply brief (3.0 hrs.); draft "incurred cost" and prepare necessary arguments for section 113 brief (3.0 hrs.); conference with J. Agnello re license brief (.5 hrs.).	10.50

W. R. Grace & Co.

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		<u>Hours</u>
07/22/01 MM	Office conferences with Mr. Marraro, Mr. Pelletier and Mr. Hughes re various task to be completed for filings (1.1 hrs.); review various case materials and databases for documents to be incorporated into appendix to be filed (8.2 hrs.); review, organize and create appendix (two volumes) to be filed (2.7 hrs.); cite check and shepardize various briefs (1.6 hrs.).	13.50
CHM	Review and edit of summary judgment briefs (strict liability, Grace & Co., CERCLA 107) license agreement (6.5 hrs.); draft sections of section 113 brief (2.5 hrs.); work on appendix material to section 113 brief (1.5 hrs.).	10.50
NAB	Pull and copy documents to be used in appendix to reply summary judgment briefs ((7.5 hrs.); copy and bind appendices to reply summary judgment briefs (7.5 hrs.).	15.00
PCC	Revise brief on CERCLA Section 107 (2.0 hrs.); revise brief on license agreement (1.0 hrs.); ;egal research re use of extrinsic evidence in interpreting license agreement (1.5 hrs.); telephone conference with Messrs. Hughes and Marraro re CERCLA and strict liability issues (.5 hrs.).	5.00
AP	Final edit of CERCLA reply brief to include C. Marraro and B. Hughes edits and to meet page limits (2.1 hrs.); review and revise NCP "necessity" argument for both CERCLA 113 and 107 in accordance with instructions of C. Marraro (4.0 hrs.); additional research regarding NCP consistency for inclusion in reply brief (3.0 hrs.); review citecheck and finalize P. Condrion's draft of the reply brief on Co. and Ltd.'s claims (2.5 hrs.); review,	14.60

W. R. Grace & Co.

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		<u>Hours</u>
	citecheck and finalize CERCLA reply brief (3.0 hrs.).	
07/22/01 WH	Finalize draft of strict liability reply brief for review by Mr. Marraro (7.9 hrs.); finalize strict liability brief for filing on July 23 (2.8 hrs.); legal research on NCP issues in connection with CERCLA 107 and CERCLA 113 reply briefs (2.6 hrs.); draft inserts re NCP issues for CERCLA 107 and 113 briefs (2.1 hrs.); review and revise Ms. Pelletier's draft reply brief in support of CERCLA 107 motion (2.7 hrs.).	18.10
BB	Analyze, coordinate and prepare exhibits for inclusion in summary judgment appendix (5.1 hrs.); update draft index to appendix (.5 hrs.); assist Mr. Hughes in reviewing of strict liability brief and analyzing and identifying exhibits to brief (2.7 hrs.); review and proof Grace Ltd. brief, cite check and Blue Book brief for Mr. Condrón (.8 hrs.); research case files, collect, coordinate and prepare exhibits for Grace Ltd. brief for Mr. Condrón (1.2 hrs.); assist Mr. Marraro in reviewing of CERCLA 113 brief and analyzing, identifying and preparing exhibits to brief (1.7 hrs.); coordinate and prepare duplicate sets of exhibits for filing and filing packages (2.3 hrs.).	14.30
07/23/01 DB	Research case files and productions CDs for documents in preparation for deposition (4.5 hrs.); preparation of, pulling and copying expert reports (5.0 hrs.).	9.50
BB	Respond to telephone inquiry from case expert (.2 hrs.); research documents relied upon by case expert for pertinent issue information in preparation for 7/24/01 deposition for Mr. Hughes (2.9 hrs.); research document database, CDs and case files for documents relied upon	7.60

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Hours

by expert in preparation for 7/26/01 deposition (2.8 hrs.); organize pertinent documents and prepare fax to Mr. Hughes in NJ for deposition (.7 hrs.).

07/23/01 PCC	Draft and research insert for license agreement brief on ratification and apparent authority (1.2 hrs.); telephone conference with Ms. Flax re license agreement brief (.3 hrs.).	1.50
MM	Conferences with Ms. Flax in New Jersey re finalizing the briefs to be filed (2.4 hrs.); review and organize various documents in preparation of the filing of the stated briefs (7.8 hrs.); conference with U.S. District Court in New Jersey re filing all stated briefs with all supporting documentation (1.8 hrs.).	12.00
WH	Final edits to reply briefs in support of Grace's CERCLA 107 and 113 summary judgment motions (1.8 hrs.); conferences with Ms. Flax and Ms. Pelletier re finalizing and filing all summary judgment reply briefs (1.3 hrs.); review Honeywell's opposition brief to Grace/ICO motion for summary judgment on their RCRA claims (1.1 hrs.); conference with Mr. German re RCRA brief and Valera/Schmiermund expert depositions (.4 hrs.); prepare for expert deposition of Peter Deming re geotechnical/heaving issues (4.9 hrs.); telephone conference with Dr. Valera re questions for Deming deposition (.8 hrs.).	10.30
CHM	Final preparation of reply briefs for filing (2.0 hrs.); reanalyze cases in Honeywell opposition on CERCLA section 113 brief with Ms. Pelletier (1.5 hrs.); final edits to CERCLA section 113 brief (.5 hrs.); conference calls	4.50

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		<u>Hours</u>
	with Ms. Flax re filing of briefs with court (.5 hrs.).	
07/23/01 AP	Conference with C. Marraro re distinguishing cases cited by Honeywell (.8 hrs.); re-draft footnote distinguishing cases relating to equity of applying a residential cleanup to the Route 440 site (1.5 hrs.); conference with M. Flax re finalization and filing of briefing package (.4 hrs.); conference with C. Marraro regarding dispute over scheduling Gayle Koch deposition (.3 hrs.).	3.00
TP	Call with Mr. Marraro (.2 hrs.); office conference with Ms. Pelletier re Gayle Koch's documents, reviewed the documents to determine if all have been produced to Honeywell and call with Mr. Boenning regarding same (1.2 hrs.); reviewed ECARG balance sheets for indication of clean-up costs for Route 440 site (.2 hrs.).	1.60
NAB	Prepare documents to be returned to Peter Champman (2.0 hrs.); file and index case documents (4.5 hrs.).	6.50
07/24/01 MM	Telephone conference with Ms. Flax re post filings and other miscellaneous matters relating to 7/23/01 filings (0.4 hrs.).	0.40
AP	Preparation for Walsh deposition.	4.00
BB	Research case files, CDs and production database for documents in preparation for 7/26/01 deposition for Ms. Flax (.8 hrs.); scan and email documents to Ms. Flax for same (1.8 hrs.); research case files and document database for documents in preparation for 7/26/01 deposition for Ms. Pelletier (2. hrs.); collect, prepare and organize documents for	10.00

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		<u>Hours</u>
	deposition for Ms. Pelletier (.8 hrs.); read and analyze documents in deposition preparation binders for relevant issue information re 7/24/01 deposition for Mr. Hughes (3.7 hrs.); prepare documents for deposition and prepare fax of same to Mr. Hughes (.4 hrs.).	
07/24/01 DB	Researching files for documents in preparation for deposition (3.0 hrs.); preparation of binders, pulling and copying expert reports (3.0 hrs.).	6.00
CHM	Lengthy prep session with Dr. Valera for depositions.	7.50
TP	Telephone conference with Mr. Boenning requesting copies of all Koch documents including those previously produced and prepared cover letter with costs for same (.4 hrs.); telephone conferences with Dr. Koch re production of her notes (.1 hrs.).	0.50
WH	Prepare for and take Peter Deming's deposition in NJ (9.6 hrs.); conference with Dr. Valera and Mr. Marraro re outcome of Mr. Deming's deposition (1.4 hrs.); prepare Dr. Valera for his deposition on July 25 re geotechnical/heaving issues (3.2 hrs.).	14.20
07/25/01 AP	Preparation for Walsh deposition (4.9 hrs.); draft outline for same (2.0 hrs.).	6.90
CHM	Meeting with J. Agnello re strategic issues in litigation.	1.50
TP	Telephone conferences with Mr. Marraro and Dr. Koch re her deposition (.2 hrs.); preparing for deposition (.9 hrs.).	1.10

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		<u>Hours</u>
07/25/01	WH Finishing preparing Dr. Valera for his expert deposition (1.4 hrs.); defend Dr. Valera's deposition (6.8 hrs.); conference with Mr. Marraro re same (.3 hrs.); prepare questions re Deming/geotechnical issues for Blanchard deposition (1.2 hrs.); conference with Mr. Golliday (.5 hrs.); review Honeywell's November 2000 heaving study in preparation for Schmiermund deposition (.8 hrs.); review and analyze Honeywell's reply brief in support of its motion for summary judgment on Grace's claims (2.2 hrs.).	12.70
	DB Researching files for documents in preparation for deposition (3.5 hrs.); pulling and copying expert reports (7.5 hrs.).	11.00
	BB Incorporate new pleadings and appendices into case files and create new files (2.8 hrs.); review, analyze, coordinate, sort and prepare new correspondence and case documents for incorporation into case files (3.5 hrs.); incorporate supplemental expert documents into case index and create new files (1.7 hrs.).	8.00
07/26/01	MM Telephone conference with Mr. Hughes re reviewing Mr. Walerko's 5/15/01 deposition for specific testimony (.2 hrs.); review Mr. Walerko's deposition (.4 hrs.); forward testimony to Mr. Hughes for review (.2 hrs.); telephone conference with Mr. Agnello's office re same (.1 hrs.); review various accounting records re adjusting entries according to client's new billing guidelines (.7 hrs.); case management (.8 hrs.).	2.40
	CHM Comment on letter to Judge Cavanaugh re AAA deposition (.5 hrs.); conference with J. Agnello re same (.2 hrs.); conference with M. Caffrey re addition of AAA depositions (.2	4.90

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		<u>Hours</u>
	hrs.); conference with investigator (.2 hrs.); prepare draft letter to EPA Region 1 re Harris letter re action (.6 hrs.); review deposition transcripts of Honeywell experts Rifkin, Wells and Hart (3.2 hrs.).	
07/26/01 WH	Meeting with Dr. Schmiermund to prepare him for his expert deposition on July 27 re heaving/geotechnical issues (9.6 hrs.); conference with Ms. Flax re Blanchard deposition and related geotechnical/heaving issues (.8 hrs.); conference with Mr. Marraro re status of deposition and preparation of Ms. Koch (.4 hrs.).	10.80
AP	Take Walsh deposition.	7.50
NAB	File and index case documents (2.5 hrs.); load new deposition transcripts into Summation database and add to server (1.0 hrs.).	3.50
07/27/01 DB	Review and organized new production documents and integrate into case files (5.5 hrs.).	5.50
CHM	Study Honeywell reply brief and new exhibits.	3.20
NAB	File and index new correspondence.	5.50
PCC	Review Brennan deposition attached to Honeywell reply brief (.8 hrs.); draft memo to Mr. Marraro re Brennan deposition (.2 hrs.); review Honeywell reply brief (1.0 hrs.).	2.00
TP	Telephone conferences with Dr. Valero re photos in follow-up to phone message from Mr. Marraro re same.	0.30

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		<u>Hours</u>
07/27/01	WH Finish preparing Dr. Schmiermund for his deposition (1.8 hrs.); defend Dr. Schmiermund's deposition (6.8 hrs.); conference with Ms. Koch re her deposition (.4 hrs.); prepare file memorandum re Valera and Schmiermund depositions (.8 hrs.); draft letter to Mr. Caffrey re production of additional documents from Peter Deming's file (.4 hrs.).	10.20
07/30/01	DB Preparation of binders including pulling and copying expert reports (3.0 hrs.); organized and re-filed case boxes as well as re-labeled (3.0 hrs.).	6.00
	CHM Review draft and RCRA brief from plaintiffs (2.5 hrs.); conference call with plaintiffs' counsel (.5 hrs.); conference call with Mr. Agnello re "entire controversy" and discovery issues (1.3 hrs.).	4.30
	NAB File and index new correspondence and case files.	7.50
	MM Office conferences with Mr. Marraro re producing various reference documents from case material (.3 hrs.); search case material and produced requested material to Mr. Marraro for review (1.4 hrs.); case management (.6 hrs.).	2.30
07/31/01	CHM Edit RCRA brief.	3.50
	BB Consult by telephone with plaintiffs' counsel re appendix to joint RCRA brief (.1 hrs.); review and quality check in-house CDs for production documents, cross-reference against production files and create memo re document issues for Ms. Pelletier (3.8 hrs.); provide direction to litigation clerk for creation of NJSA NJ Industrial Site Recovery Act and NJ Spill Compensation & Control Act and quality	5.30

W. R. Grace & Co.

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Hours

check same (.4 hrs.); review and organize new deposition transcripts and exhibits, prepare for incorporation into case files and provide direction to litigation clerk re same (1.0 hrs.).

07/31/01 DB	Create and prepare index to NJSA NJ Industrial Site Recovery Act and NJ Spill Compensation & Control Act and prepare sets for distribution to attorneys.	1.00
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Amount

Total Fees	1287.50	\$281,653.50
7/6/2001 Payment - thank you		(\$50,000.00)
7/31/2001 Less Deduction of 40% of Fees Per Agreement		(\$112,661.40)
Balance Due		\$118,992.10

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	201.00	130.00
Darlene Boozer, Legal Clerk	131.30	95.00
Natasha A. Bynum, Legal Clerk	120.90	95.00
Peter C. Condrón, Counsel	61.50	335.00
William Hughes, Counsel	215.60	305.00
Anthony F. King, Partner	1.50	375.00
Tonya Manago, Sr. Paralegal	7.70	130.00
Christopher H. Marraro, Partner	165.40	420.00
Rebecca Mitchell, Paralegal	0.40	115.00
Mahmoude Moasser, Paralegal	46.50	130.00
Tamara Parker, Associate	77.40	260.00
Angela Pelletier, Associate	163.60	200.00
F. Paul Pittman, Paralegal	2.30	115.00
Reilly L. Smith, Paralegal	30.30	115.00
Alec C. Zacaroli, Associate	62.10	185.00

MATTER 9 - LIBBY, MT.

FEES - JULY 2001

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

August 28, 2001

W. R. Grace & Co.
Attention: William Corcoran
Vice President-Public & Regulatory Affairs
7500 Grace Drive
Columbia, MD 21044

Invoice #12283

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>
07/02/01	CHM Conference with J. Spinello's office re meeting date with Grace (.3 hrs.); review Libby articles (.2 hrs.).	0.50
07/13/01	CHM Conference call with EPA re meeting (.3 hrs.); conference call with client re same (.5 hrs.); review NY Times article and Grace response (1.0 hrs.).	1.80
07/16/01	CHM Meeting with Dr. Goad re analytical methods in dispute.	0.80
07/18/01	CHM Lengthy conference call re upcoming meeting with EPA (2.5 hrs.); follow up calls with Mr. Corcoran (.5 hrs.).	3.00
07/19/01	CHM Conference call with client re EPA meeting (.5 hrs.); review various Libby articles (.7 hrs.).	1.20
07/24/01	CHM Conference call with Dr. Goad re materials for meeting.	0.50

W. R. Grace & Co.

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		<u>Hours</u>	
07/26/01	CHM Extensive conference call with J. Spinello (1.0 hrs.); conference call with W. Corcoran re same (.3 hrs.).	1.30	
07/30/01	CHM Conference with W. Corcoran (.2 hrs.); review articles re Libby (.5 hrs.); review EPA presentation on Libby (.3 hrs.).	1.00	
			<u>Amount</u>
Total Fees		10.10	\$4,242.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	10.10	420.00

MATTER 10 - FEE APPLICATION

FEES - JULY 2001

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

August 28, 2001

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12283

For Professional Services Rendered in Connection with Preparation of Fee Application to
Bankruptcy Court - Matter 10

Professional Services:

	<u>Hours</u>	
07/02/01 CHM Prepare fee application for April and May 2001 (5.2 hrs.); conference with Kirkland & Ellis re fee application issues (.5 hrs.).	5.70	
07/05/01 CHM Complete preparation of fee application.	2.50	
07/08/01 CHM Prepare summary statement on fee applications and conference with local counsel re same.	0.60	
		<u>Amount</u>
Total Fees	8.80	\$3,696.00
Balance Due		<u>\$3,696.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	8.80	420.00

EXHIBIT B

EXPENSE SUMMARY

Expense Category	Total Expenses
Airfares	\$2,697.25
Outside Messenger	\$156.12
Auto Rental	\$716.10
Copies- Internal and Outside	\$24,511.91
Hotels	\$2,134.40
Facsimile	\$149.25
Lexis	\$5,445.24
Meals during Travel	\$986.86
Telephone	\$352.75
FedEx	\$2,007.41
Parking	\$200.50
Taxis/Miscellaneous Travel Expenses	\$269.10
Westlaw	\$8,826.00
Overtime Meals	\$563.36
Overtime Meals - Attorneys/Paralegals	\$200.91
Overtime Transportation	\$306.60
Secretarial Overtime	\$2,793.60
TOTAL	\$52,387.36

MATTER 6 - HONEYWELL
EXPENSES - JULY 2001

Wallace
King
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

August 28, 2001

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12283

For Professional Services Rendered in Connection with Honeywell Litigation - Matter 6

Disbursements:

	<u>Amount</u>
Air Fare to New Jersey for Deposition - 7/12-13/01	483.00
Air Fare to New Jersey for Depositions - 7/9-11/01	483.00
Air Fare to Newark, NJ for Deposition - 7/16-17/01	250.00
Air Fare to Newark, NJ on 4/2/01-4/3/01	628.25
Air Fare to/from Newark on 4/19 and 4/30	853.00
Auto Rental in New Jersey for Depositions - 7/9-11/01	290.08
Auto Rental on trips to Newark on 4/19 and 4/30	426.02
Copy Costs - Internal	5,087.70
Courier Service	47.92
Delivery Service	108.20
Facsimile Costs	141.75
FedEx Costs	2,007.41
Hotel in New Jersey for Filing Preparation	80.09
Hotel in New Jersey for Filing of Briefs - 7/23-24/01	381.08
Hotel in Newark, NJ for Deposition - 7/16-17/01	279.58
Hotels in Newark for 4/19 and 4/30	1,393.65
Lexis Costs	5,445.24
Long Distance Charges	352.75
Meals in D.C. Meeting with Team	633.36

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	<u>Amount</u>
Meals on trips	610.39
Merrill Corporation - Outside Copies Todd Delaney Documents	1,686.47
Miscellaneous Travel Expenses	33.10
Outside Copies	17,737.74
Overtime Meals - Attorney/Paralegals	130.74
Overtime Transportation	306.60
Parking on trips	200.50
Secretarial Overtime for Preparation of Briefs	2,793.60
Taxis on trips	236.00
Westlaw	8,826.00
	<hr/>
Total Disbursements	\$51,933.22

MATTER 9 - LIBBY, MT.

EXPENSES - JULY 2001

Wallace
King
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

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August 28, 2001

W. R. Grace & Co.
Attention: William Corcoran
Vice President-Public & Regulatory Affairs
7500 Grace Drive
Columbia, MD 21044

Invoice #12283

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Disbursements:

	<u>Amount</u>
Facsimile Costs	7.50
Meals on trips	376.47
Overtime Meals - Attorney/Paralegals	70.17
	<hr/>
Total Disbursements	\$454.14